

Wildflower Society of WA (Inc) Information for and Comment on the Draft Kalgulup Management Plan

PART A: Introduction and Additional Information

The Wildflower Society of WA (Inc.), hereafter the Society commends the move to recognise and formalise setting up the Kalgulup Regional Park in the Draft Kalgulup Management Plan (hereafter the Draft Plan). The Society has had a long association with the City of Bunbury especially in relation to the documentation of the natural values of bushland in the area of the Plain in the City of Bunbury and the Shires of Capel, Dardanup and Harvey (hereafter the Kalgulup Park).

1.1 20 years of Society Bushland Plant Survey in Bunbury

The Society's Bushland Plant Survey work is part of a program dating back to 1988 and is based on best practise survey techniques. This work involves point sampling of 10 X 10 m areas (quadrats) and recording landscape, soil, vegetation, vegetation condition and the total native and weed flora for each quadrat (Keighery 1994). Each quadrat is located with knowledge of the patterning of vegetation and flora across the Swan Coastal Plain. Quadrat data is analysed to identify regional floristic groups or Swan Coastal Plain floristic community types (SWAFCTs) that underpin regional conservation planning on the Swan Coastal Plain and the identification of threatened ecological communities (Gibson et al 1994, *Bush Forever* 2000, EPA 2003, Keighery et al 2020).

The Society began surveying the bushland in the area of the Draft Plan in 1995. This work was done in collaboration with several government departments (now DWER and DBCA), local government, Bunbury Naturalists Club and community members. Bernard Bischoff from Bunbury has been a key participant in much of the survey work, particularly in the area of the proposed Preston River to Ocean Regional Park (PROP). Table 1 lists the quadrats located and sampled as part of the Society program in the Kalgulup Park.

In 2015/16 an approx. 20 quadrats were located and sampled for the Wild Bunbury Project. This work located additional quadrats and resampled a number of quadrats from 1994 work. This data is yet to be analysed. This work coincided with a South West Catchment Council (SWCC)/City of Bunbury/DPaW project to maintain, protect, and where possible enhance the ecological integrity of the proposed PROP. Bernard Bischoff alerted us to this and the Society investigated working of the Survey group working with SWCC to revisit the sequence of study sites established in 1994 (see Table 1). All parties expressed interest, hence the Survey work in 2015 and 2016. This work will allowed us to locate/establish similar quadrats (located with permanent markers 20 years ago), establish these as a set of monitoring and teaching quadrats, resample the quadrats and contribute to the flora list for the area.

This flora and vegetation survey work in the Bunbury area is ongoing and the Society is working towards a book on the flora and vegetation of the Bunbury area (Wild Bunbury Project, for information contact enquiry@wildflowersocietywa.org.au).

1.2 International, National and Regional Natural Values of the Kalgulup Park

The natural values of the Kalgulup Park identify the Park as being of international, national, regional and local significance. Sufficient work has been done on the Park by the Society and other groups to clearly establish these world class values. In 2015 the Bushland Plant Survey letter to Bunbury Survey participants stated

'All work to this date has demonstrated the outstanding conservation values of this proposed park (PROP). The natural areas of the park include the coastal Quindalup Dunes (Maidens), the dunes and flats of the Spearwood Dunes (Shearwater Forest, Usher, College Park), Bassendean Dunes (Manea Park) and a diversity of Pinjarra Plain related plant communities (Laughton Park, Hay Park and Manea Park and adjacent bushland).'

With the inclusion of the PROP in the Park the area has many additional outstanding conservation/natural values. The Draft Plan addresses some of these values. However the Draft Plan: underplays some values; and does not adequately outline/summarise values; and omits/incorrectly describes some values as outlined below.

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TABLE 1: Swan Coastal Plain Floristic Community Types sampled in the area of the Kalgulup Park

KEY

- Column 1 Ecological community threatened status WA/National**
NA = not assessed, **bold** SWAFCT rows have not been included in the Draft Plan (p17/18)
- Column 2 Swan Coastal Plain Floristic Community Type (SWAFCT) Code**
The numbers of the types additional to Gibson *et al.* (1994) are italicised if they are subsets of an existing group (in types 19, 20, 23 and 30) and italicised and preceded by an S if they are supplementary groups (Government of Western Australia 2000b).
- Column 3 General Description of Floristic Community Type**
Descriptions are based on generalised information from all quadrats in the group. Structural units are categorised into forest, woodlands, shrublands, sedgeland and herblands after Gibson *et al.* (1994) and Government of Western Australia (2000b).
- Column 4 Kalgulup Areas [associated quadrats (major landform unit location)]**
underlined Quadrats not sampled and located with Society
Major Landform codes
QD Quindalup Dunes
SP Spearwood Dunes
BD Bassendean Dunes
PP Pinjarra Plain
bPP = Pinjarra Plain with overlying Bassendean Dunes
A = alluvium
M = Marine deposit, calcareous possible salt

SWAFCT	General Description of SWAFCT	Bushland areas and associated quadrats
Supergroup 1 - Foothills/Pinjarra Plain		
VU	1b Southern <i>Eucalyptus calophylla</i> woodlands on heavy soils	Manea [*Race02 (bPP)]
Supergroup 2 - Seasonal Wetlands		
NA	4 <i>Melaleuca preissiana</i> damplands	Manea [MGK02 (BD)]
NA	5 Mixed shrub damplands	Manea [Swamp01 (BD_bPP);
NA	06 Weed dominated wetlands on heavy soils	Manea [Sunday01 (BD/PP)]
VU/ CR	7 Herb rich saline shrublands in clay pans	Manea [Swamp02 (BD_bPP); *Race01 (PP)]
VU/ CR	08 Herb rich shrublands in clay pans	Hay [Hay01 (M/A)]
VU/ CR	9 Dense shrublands on clay flats	Manea [MANEA01 (PP)]
EN/ CR	10a Shrublands on dry clay flats	From Draft Plan p17 [?Hay/Manea (PP)]
NA	17 <i>Melaleuca raphiophylla</i> - <i>Gahnia trifida</i> seasonal wetlands	Hay [Hay02 (M/A)]; <u>Leschenault [LESCH06 (QD/M)]</u>
VU/ NA	18 Shrublands on calcareous silts	Hay [Hay05 (M-AL)]
NA	<i>S01 Astartea</i> aff. <i>fascicularis</i> / <i>Melaleuca</i> species dense shrublands	Manea [Swamp03 (BD_bPP);
NA	<i>S05 Acacia saligna</i> wetlands	Hay [Hay04 (M/A)]
Supergroup 3 - Uplands centred on Bassendean Dunes		
P3/ EN	21a Central <i>Banksia attenuata</i> - <i>Eucalyptus marginata</i> woodlands	MANEA02 (BD); Sunday02 (BD/PP); Manea [MGK01 (BD)]; <u>Wardandi [AUSTRAL01 (SD/BD)]</u>
P3/	21b Southern <i>Banksia attenuata</i> woodlands	Manea [MANEA03 (BD), MGK03, 04 (BD)]

SWAFCT	General Description of SWAFCT	Bushland areas and associated quadrats
EN		
P3/ EN	21c Low lying <i>Banksia attenuata</i> woodlands or shrublands	<u>Gelorup [dill01 (BD)] outside Park but likely to be in the area</u>
	Supergroup 4 - Uplands centred on Spearwood and Quindalup Dunes	
	Spearwood Dunes	
P3/ CR	25 Southern <i>Eucalyptus gomphocephala</i> - <i>Agonis flexuosa</i> woodlands	<u>Gelorup [Gelor01 (SD)]; Shearwater/Maidens [Gmaid01-04 (SD), Nmaid05]; College Grove [bunb01 (SD)]; Australind Reserves/Elbow [colr01 (SD)]</u>
	Quindalup Dunes	
P3	29b <i>Acacia</i> shrublands on Taller Dunes	Maidens [Nmaid01,03 (QD), BMaid02(QD)]
P3	30b Quindalup <i>Eucalyptus gomphocephala</i> and/or <i>Agonis flexuosa</i> woodlands	Maidens [Nmaid04 (QD)]; Leschenault [LESCH01-05 (QD)]
NA	S13 Northern <i>Olearia axillaris</i> - <i>Scaevola crassifolia</i> shrublands	not sampled, inferred in area
NA	S14 <i>Spinifex longifolius</i> grassland and low shrublands	not sampled, inferred in area

1.2.1 Landforms, Native Vegetation, Flora and Habitats

The vegetation of the Swan Coastal Plain is internationally, nationally and regionally renowned for the diversity of plant communities and flora. It is heavily cleared and all bushland should be protected and managed for conservation. The vegetation flora of the Kalgulup Park is a unique section of the Swan Coastal Plain. The principal natural values establishing the Park's bushland as being internationally, nationally and regionally significant are outlined below. Values not/incorrectly/poorly recognised/described in the Draft Plan are underlined.

1.2.2 Vegetation values

Landforms

The combination of vegetated landforms is outstanding and diverse including steep dunes, low dunes, plains and wetlands (flats and depressions or basins) from Quindalup Dunes, Spearwood Dunes, Bassendean Dunes, Pinjarra Plain and Marine and estuarine deposits (Draft Plan sections 6, 7, 8). The only Plain major landform unit not included is the Foothills.

Vegetation complexes

Includes 7 vegetation complexes, all of which are poorly reserved (Draft Plan), 4 of which are extensively cleared on the Plain (Draft Plan). The remaining 3 with larger areas remaining naturally revegetated are subject to loss/degradation with changing sea levels and should be in a further category of risk due to climate change.

Swan Coastal Plain Floristic Community Types (SWAFCTS)

Includes at least 20 different regional floristic groups (Table 1) in typical and unusual sequences. The set of quadrats that have been established to determine these regional groupings are of ongoing use: as a base reference information set for scientific studies; and in monitoring changes in vegetation and flora and the effectiveness of management actions.

Threatened and Priority ecological communities (TECs, PECs)

13 of the 20 SWAFCTS listed are threatened at the state and/or federal level (Table 1). Table 1 lists 2 SWAFCTS that are not included in the Draft Plan (bold in Table 1, ie 9 TECs and 8 PECs). It is also noteworthy that the SWAFCTS with *Banksia* and *Tuart* in their descriptions are in the national endangered community *Banksia* woodlands and *Tuart* woodlands of the Swan Coastal Plain respectively, as well as being P3 at the state level. This gives a total of 9 TECs and 12 PECs. This diversity of TECs and PECs matches that of Perth, making Perth and Bunbury Australian centres for the diversity of TECs and PECs.

Wetlands

There are many different vegetated wetlands on flats and depressions (or basins) in the Park, 4 of the wetland SWAFCTs are TECs. Draft Plan section 7 lists a diverse suite of conservation and Resource Enhancement wetlands for the Park.

1.2.3 Flora

Preamble

In the first half of the 1990s the Society surveyed bushland areas on the southern boundary of the City of Bunbury as part of the regional study of the Swan Coastal Plain plant communities (Table 1). From this work and a number of other short reports together with a substantive amount of his own work Bernard Bischoff assembled a comprehensive flora list for PROP. Just over 500 native plant taxa were listed for this portion of the Park. With the inclusion of the PROP into the Kalgulup Park it would be expected that there would be another 100 – 200 taxa in the Park as the PROP does not include any and/or large areas of riverbanks, Mangrove flats, Samphire flats and the Banksia woodlands north of Bunbury. A conservative estimate for the Park would be 650 native plant taxa. It is estimated that at least 150 of these taxa would be of conservation significance

Flora Values

Diverse and representative flora

More than 650 native plant taxa are found in the Park. This a diverse flora representative of the flora of the upland and wetland flora of the Quindalup Dunes, Spearwood Dunes, Bassendean Dunes, Pinjarra Plain and Marine and estuarine deposits in the Bunbury area.

Rare Flora

With more than 100 of conservation significance (just 34 listed in the Draft Plan under threatened, priority and regionally significant species, p19.)

1.2.4 Habitats

With a mostly linked combination of vegetated landforms including steep dunes, low dunes, plains and wetlands (flats and depressions or basins) from Quindalup Dunes, Spearwood Dunes, Bassendean Dunes, Pinjarra Plain and Marine and estuarine deposits the Park supports a diverse combination of habitats. These included all plant communities both upland and wetland and are not restricted to the Tuart and waterbird feeding and breeding areas as quoted in the Draft Plan (p3, section 3).

1.2.5 Ecological Linkages

With a mostly linked combination of vegetated landforms including steep dunes, low dunes, plains and wetlands (flats and depressions or basins) from Quindalup Dunes, Spearwood Dunes, Bassendean Dunes, Pinjarra Plain and Marine and estuarine deposits the Park supports sequences of unique (PROP) and typical (northern section Park) ecological linkages of the area.

3 Selection criteria for the identification of regionally significant natural areas on the southern Swan Coastal Plain (Government of WA 2000a and b, EPA 2003).

In light of the natural values outlined above the Kalgulup Park well meets all of the criteria for identifying regionally significant natural areas (listed below) on the southern Swan Coastal Plain.

REPRESENTATION OF ECOLOGICAL COMMUNITIES

A number of areas selected to represent the range of ecological communities and the places in which these communities merge

DIVERSITY

Areas with a high diversity of flora and/or fauna species or communities in close association

RARITY

Areas containing rare or threatened communities or species, or species of restricted distribution

MAINTAINING ECOLOGICAL PROCESSES OR NATURAL SYSTEMS

Maintenance of ecological processes or natural systems at a regional or national scale

SCIENTIFIC OR EVOLUTIONARY IMPORTANCE

Areas containing evidence of evolutionary processes either as fossilised material or as relict species and areas containing unusual or important geomorphological or geological sites; Areas of recognised scientific and educational interest as reference sites or as examples of the important environmental processes at work

GENERAL CRITERIA FOR PROTECTION OF WETLAND, STREAMLINE, AND ESTUARINE FRINGING VEGETATION AND COASTAL VEGETATION

Conservation category wetland areas including fringing vegetation and associated upland vegetation; Coastal vegetation within the accepted coastal management zone

PART B: Specific Comments on the Draft Plan

Management context – 1. Purpose of the plan, page 1

It is imperative that the international, national and regional values of the natural areas defined above (section 1.2) are protected and managed as the **first priority** of the Plan. The level of current and potential use by the community is of concern.

It should be kept in mind that not all regionally significant natural areas were recognised in the Bunbury Greater Regional Scheme process in in the late 1990s and early 2000s. It is likely that many areas of regional conservation value have been approved for clearing and/or not identified.

There is a need for nature reserves and other conservation areas to be well managed. The revenue required for this should be estimated and the need for such monies be pre-empted in the Plan.

Management context – 3. Park Values, page 3

Table 2 amendments

Natural Values - expanded to include all of the values outlined in 1.2 above.

Recreation, tourism and community values – the order should be reversed to Community, recreation and tourism values to reflect the high community value of the natural areas as illustrated by the vigorous and effective community campaigns to protect natural area included in the Park ie Leschenault Peninsular, Twin Rivers, College Grove, Manea areas, Maidens and Shearwater Forest. Also the first dot point should be last to reflect that the natural values are a priority to protect. The following activities should be described as limited: cycling, camping, boating and beach 4X4 driving excluded (especially in light of increased erosion of beaches with climate change).

Management context – 4. Land tenure and boundaries

Page 6 Inclusion of other land into the Park

This section is endorsed and a commitment needs to be made to assess all of the remnant vegetation within/adjacent/nearby the Park's boundaries for inclusion.

Management context – 4 Park Management

Page 7 Land Use planning within the park

At all times the natural values are the priority for protection, regardless of the land owner/manager. The naming of the DBCA Disturbance Approval System is of concern as it does not reflect to previous sentence and should be termed a 'Disturbance Assessment System'.

Page 7 Adjacent to the park

Proposed subdivisions need to include provision of land for recreation, buffers and other purposes rather than being allowed to put pressure on government land managers to burn native vegetation (for example) to protect their developments or provide more recreational land, sometimes to the detriment of the conservation estate. If population continues to grow what would be the predicted impacts on the lands available for use for human pursuits?

Natural Values – 6 Geology and Landforms

This section be checked to match **8 Native plants and vegetation**.

Natural Values – 7 Hydrology

This section should be after **8 Native plants and vegetation** and be relabelled as **Wetlands**. The heading hydrology does NOT reflect the natural values that the Park has been developed to protect.

Page 11 Surface Water

Mapping and construction of facilities for human use will not be adequate to protect wetlands in perpetuity. Serious financial commitments for resources to control weeds, feral animals, disease and erosion must be put on the table. DBCA (Lane et al) monitoring of wetlands across the State indicates changes that compromise species long-term and this is likely to be the case in Bunbury too. The potential impacts of adjacent developments do not seem to be taken into consideration with regards to salinity and groundwater levels.

Page 13 Groundwater-dependent ecosystems

This section states that 'if a licence application to take water near these sites (groundwater dependent ecosystems) is submitted, an assessment to determine any adverse effects to these sites may be needed'. This should read **MUST** rather than may, even for bores on smaller lots given the potential cumulative impacts.

Has projected population growth been considered in terms of increased demand for potable water as currently extracted by the City of Bunbury and the potential impacts on groundwater dependent ecosystems?

Natural Values – 8 Native plants and vegetation

This section should be restructured as follows

Vegetation

Vegetation Complexes add section underlined in 1.2.2 for these.

INSERT **Swan Coastal Plain Regional Floristic Groups** add section underlined in 1.2.2 for SWAFCTs including Table 1.

Plant Communities includes sections from Quindalup Dunes page 14 to Riverine page 17.

Threatened and priority ecological communities revise to reflect section underlined in 1.2.2 for these.

Plants (flora)

It should be stated that there is no full inventory of the native plants (flora) and this should be a priority action. Revise to reflect underlined in 1.2.2 .

Natural Values – 8 Native plants and vegetation specific comment

Page 13

Given that all seven vegetation communities in the proposed park are recognised as poorly represented in the conservation estate and four are extensively cleared and vulnerable, the aim should be to avoid any further clearing or deterioration in values.

Utilising Table 4 to justify any further clearing is not adequate or justifiable as it gives no indication of the actual condition of vegetation within the conservation estate nor that still extant outside of the estate.

Page 17

All areas of TEC and PEC, regardless of disturbance or weeds should be protected for nature conservation purposes. Just because we do not have either the will or resources to improve these areas at this point in time does not justify destroying them and depriving future generations of access to them.

Page 19 Plants

All populations of Priority and Threatened flora species should be protected and adequate buffers applied.

Management objective, page 19

The objective should be 'to conserve and maintain or improve the condition of all habitats and their plant communities and flora (native plants)'. The first management strategy should read (1) Maintain or improve the

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condition of all habitats and their plant communities and flora (native plants), followed by (2) then previous (1) as 3. New 3 should also refer to all conservation significant flora and restricted plant community. All the vegetation is regionally significant the focus should be on the total NOT the rare.

Key Performance Indicator, page 19

There is no context to the status of the flora in 2020 and how it arrived at this point (see section 1.2.2 to address this). There are a large number of significant flora that need specific attention on the same level as threatened flora. Plants can become extinct through loss by many small developments. Examples abound of this within the Perth Metropolitan Region. The reported loss of *Thelymitra variegata* from Manea Park and surrounds is possibly an example of this. There are regionally significant natural areas adjacent to Manea Park and east of Hay Park that have not, as yet, been included in the Park.

Natural Values – 8 Native and habitat

Page 20 Animals of conservation significance

This section states that Recovery Plans provide guidance on management of threatened and priority fauna, however given the fact for example that a Recovery Plan has been in place for the Ringtailed Possum since 1997 when it was considered Vulnerable and it is now Critically Endangered, it could be argued that these plans do not work without the support of the managers within government departments and the government of the time. If these key people are not proactive in the environment, species will continue to perish. The focus on translocation and rehabilitation of individuals, without addressing the primary issue of habitat destruction (cited in the Recovery Plan) has followed a similar path as several other fauna and flora species.

Page 21 Management Strategies

A moratorium on clearing would do more good than any more motherhood statements that suggest planning and reviewing are going to make a difference to outcomes. We all know that this is not true. Without scientists in DBCA and other agencies who actually care about the environment there can be no really positive outcomes other than for human recreational use of the land.

Management Issues – 10 Fire Management

Page 22

Property developers must not be permitted to rely on adjacent lands such as the Park to provide fire protection for their developments. The Guidelines for Planning in Bushfire Prone Areas (WAPC 2017) clearly state that developers have a responsibility for protecting their developments and providing facilities and buffers within their lands.

Rarely are environmental factors weighed as heavily as protecting human property (and life) in fire management decisions.

Management Issues – 11 Weeds and pest animals

Page 23

It should be stated that there is no full inventory of weeds and this should be a priority action.

Table 6

Euphorbia terracina (Geraldton Carnation Weed) MUST be added to this list. Weeds of concern that have small populations should be the first priority for eradication while it is still possible.

Page 23 Pest Animals

If the City of Bunbury is serious about pest animals it should consider insisting that cats are retained within their owners properties. The legislation that requires registration is a good start but does not prevent cats from decimating fauna in already vulnerable reserves.

Management Issues – 12 Plant and Animal diseases, Page 25

Rather than spending time planning and considering hygiene measures, why not just implement them? Make them mandatory for employees and contractors. The precautionary principle may be less expensive in the long run than continuing to reiterate previously covered ground.

Management Issues – 13 Climate change, Page 27

Merely considering the results of climate change information is unlikely to result in any positive benefits, why not actually acquire and incorporate more native vegetation into the conservation estate and conduct more pest and weed management rather than relying on the goodwill of volunteers alone? Also see comment in vegetation complexes section 1.2.2.

Management Issues – 15 Rehabilitation, Page 28

The focus should be on maintaining and/or improving the condition of the existing native vegetation. Rehabilitation can be very expensive and not always successful. Understandably rehabilitation effort should be focused on poorly represented vegetation communities. However, it is important to identify, acquire and protect as much remnant vegetation within the City of Bunbury as possible.

Management Issues – 16 Noongar Cultural Heritage

As remnants of Bunbury's original landscape, the natural areas are of great significance to Noongar people and allow for an ongoing relationship with 'country'. It is essential that all people's work to maintain this natural land.

Management Issues – 17 Other Cultural Heritage

The vigorous and effective community campaigns to protect natural areas included in the Park are part of Bunbury's cultural heritage and should be outlined in this section. Areas that were a focus for activity are: Leschenault Peninsular, Twin Rivers, College Grove, Manea areas, Maidens and Shearwater Forest. There should also be a section on the action for the PROP and the key role of Bernard Bischoff in this process as well as the Bunbury Naturalists Club, SWCC, City of Bunbury and the Society.

Visitor use

As the focus of the Park is protection of the natural values there should be NO use of the Park that impacts on these natural values. As a consequence this section should be reordered as follows.

The northern section of the Maidens is not suitable for designation as 'Natural Environment Use' (Map 4a), this should be altered to 'Conservation and Protection'. This area supports a threatened community (Tuart), a PEC (SWAFCT 29a) and mallee Tuart plants.

18 (22) Working with the community

A key to ongoing effective management of urban bushland is facilitating the ongoing work of Friends groups. This section should be modified to include an additional prime management strategy being: 'All managers should facilitate the formation of Bushland Friends groups for each bushland area and work with in partnership with these groups to manage the bushland. The Friends should have access to technical information collated by DBCA, SWCC and local government to support their management actions.'

Each Friends group should have a representative on the Regional Park Community Advisory Group.

19 (19) Visitor information and education

20 (20) Park access and accessibility

Page 37/38

Roads must not be permitted that purely increase land developers profits, for example access to beaches at the expense of bushland. Beach 4X4 driving should be excluded as: beach sands are important breeding areas for some birds; habitat for a number of species; and the disturbance and loss of vegetation that will occur with the predicted increased erosion of beaches with climate change.

21 (18) Visitor use and planning

Table 8 should be reordered as follows to reflect the chief purpose of the Park. The following should be at the top of the table.

Nature appreciation – add 'mindfulness' as increasingly natural areas are recognised as a key locations for environment for education, observation and mental health.

Bushwalking

ADD here Community bushland education activities, Community bushland management activities

Given the fact that all of the plant communities within the Park are poorly represented, more destructive activities such as horse riding, mountain bike riding, scenic driving and motorised recreation should be excluded as they contribute significantly to erosion, nutrient enrichment and nodes for weed and disease introduction. The remainder of activities should be ordered from the most passive to least passive and possible destructive activities placed in a separate table e.g. Sandboarding.

22 (21) Commercial operations

The Management objective should be modified to read

'The commercial services, facilities and experiences available in the Park will be limited to those that enhance the natural values of the Park. Any proposed commercial enterprise will be subject to strict environmental assessment.'

Management operations and other uses

Management operations and other uses - 23

Agreed.

Management operations and other uses - 24

Agreed

Management operations and other uses - 25

Agreed

Management operations and other uses - 26

Agreed with modification that

'If the utility or service impacts bushland this activity be relocated outside the Park as a first priority.'

Management operations and other uses - 27

Agreed with addition of a statement in regard to the grossly inadequate description of the Park's natural values in this Draft Plan.

'As a matter of urgency natural values of the Park be fully documented in two phases

Phase 1: List and describe all natural values pertaining to the criteria determining regional significance of using existing information and identify natural values in need of investigation. The Society can supply a list of known plant-based studies in the Park.

Phase 2: Develop a program to investigate natural values in need of further information.

CONTACT for natural values information: Greg and Bronwen Keighery (bjkeighe@it.net.au).

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